

# Exhibit 28

## Case Summary



Money laundering disclosure					CIPAS NCIS																																								
Case Summary	Record Data	Subject Data	Notes & Conclusion	Key Corresp																																									
<b>Incident Data</b> <table style="width: 100%;"> <tr> <td style="width: 30%;">Control Authority</td> <td style="width: 20%;">Payment Operations</td> <td style="width: 10%;">Status</td> <td style="width: 40%;">Open Source: [GK2:666814]</td> </tr> <tr> <td>Review Date</td> <td></td> <td>by</td> <td></td> </tr> <tr> <td>Remote Delivery Channel</td> <td>N</td> <td>High Profile</td> <td>Y 17 Jun 2002 00:00</td> </tr> <tr> <td>Created on</td> <td>17 Jun 2002 00:00</td> <td>by</td> <td>RBS_Mcomcl</td> </tr> <tr> <td>Last Modified on</td> <td>17 Sep 2003 00:00</td> <td>by</td> <td>RBS_Ohearaa</td> </tr> </table>				Control Authority	Payment Operations	Status	Open Source: [GK2:666814]	Review Date		by		Remote Delivery Channel	N	High Profile	Y 17 Jun 2002 00:00	Created on	17 Jun 2002 00:00	by	RBS_Mcomcl	Last Modified on	17 Sep 2003 00:00	by	RBS_Ohearaa	<b>Linked Cases</b> <table style="width: 100%;"> <tr> <td style="width: 15%; text-align: center;">276995</td> <td style="width: 85%;">Address auto-linked</td> </tr> <tr> <td style="text-align: center;">617044</td> <td>NONE</td> </tr> <tr> <td style="text-align: center;">666593</td> <td>NONE</td> </tr> <tr> <td style="text-align: center;">704079</td> <td>Account auto-linked</td> </tr> <tr> <td style="text-align: center;">708047</td> <td>Address auto-linked</td> </tr> <tr> <td style="text-align: center;">710368</td> <td>NONE</td> </tr> <tr> <td style="text-align: center;">753294</td> <td>Address auto-linked</td> </tr> <tr> <td style="text-align: center;">772682</td> <td>Address auto-linked</td> </tr> <tr> <td style="text-align: center;">1748664</td> <td>Personal auto-linked</td> </tr> <tr> <td colspan="2" style="text-align: center;">Maintain Links</td> </tr> </table>		276995	Address auto-linked	617044	NONE	666593	NONE	704079	Account auto-linked	708047	Address auto-linked	710368	NONE	753294	Address auto-linked	772682	Address auto-linked	1748664	Personal auto-linked	Maintain Links	
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Set All Risk Ratings to the the same value of:- <div style="display: flex; gap: 5px;"> <span style="background-color: yellow; border: 1px solid black; padding: 2px;">Amber</span> <span style="background-color: blue; border: 1px solid black; padding: 2px;">Blue</span> <span style="background-color: green; border: 1px solid black; padding: 2px;">Green</span> <span style="background-color: indigo; border: 1px solid black; padding: 2px;">Indigo</span> <span style="background-color: red; border: 1px solid black; padding: 2px;">Red</span> </div>																																													
Personal Data					Add																																								

Surname	Forenames	Date Of Birth	Sex	Key Information	Risk	Adj	
HEWITT	IBRAHIM BRIAN		M	NONE	Red	Red	Edit
MUSTAFA	E	17 Nov 1955	M	NONE	Red	Red	Edit
QUNDIL	J		M	NONE	Red	Red	Edit
SADOON	HAMEED THABIT		M	NONE	Red	Red	Edit
SAFIEE	HABIBAH		M	NONE	Red	Red	Edit

  

Business Data							Add
Business/Org Name	Company Ref. No.	Legal Jurisdiction	Key Information	Risk	Adj		
PALESTINIANS RELIEF & DEVELOPMENT FUND		UNITED KINGDOM	NONE	Red	Red	Edit	

  

Telephone Data							Add
-None-							

  

Address Data							Add
Bldg No. & Name	Street	Town	Postcode	Risk	Adj		
CLARK CRT	STILTON CRES	LONDON	NW10 8DJ	Red	Red	Edit	
PO BOX 333	LONDON		UNDEFINED	Red	Red	Edit	

  

Account Data							Add
Account Name	Account No.	Sortcode	Account Type	Currency	Risk	Adj	
PALESTINIANS RELIEF & DEVELOPMENT FUND	140-00-04156838	60-08-22	Currency Account	US Dollar	Green	Green	Edit

  

Miscellaneous Data							Add
-None-							

  

Case Notes							Add
Type	Date	User	Text				
Case notes	17 Sep 2003	Migrated	see case 617044 JC has disclosed on all accounts in a defens			View	
Summary and Assessment	17 Sep 2003	Migrated	Further to our disclosure NI 142909, a large international p			View	
Conclusion	17 Sep 2003	Migrated	On the basis of the information available to us at the prese			View	

  

Key Correspondence						
Upload Doc Title	Author	User	Date			Add
letter to RM	RBS\Mcomcl	GK2	09 Jul 2002	View		Edit
memo from RM	RBS\Mcomcl	GK2	10 Sep 2002	View		Edit
chaser to RM	RBS\Mcomcl	GK2	01 Aug 2002	View		Edit
explanation from cust	RBS\Mcomcl	GK2	10 Sep 2002	View		Edit
expl from cust	RBS\Mcomcl	GK2	10 Sep 2002	View		Edit
expl from cust	RBS\Mcomcl	GK2	10 Sep 2002	View		Edit

expl from cust	RBS\Mcomcl GK2	10 Sep 2002	View	Edit
SUSPICION REPORT	RBS\Allenbc GK2	12 Jul 2002	View	Edit
SUSPICION REPORT	RBS\Allenbc GK2	12 Jul 2002	View	Edit
<b>NCIS Disclosures</b>				
<b>Author</b>		<b>Date</b>		
<a href="#">NCIS Disclosure 207993 (R)</a>	RBS\Mcomcl	17 Jun 2002	Amend NCIS Number	
<b>No CIFAS Reports</b>				

**1. User:** Migrated**On:** 17 Sep 2003 00:00

Print

Copy

Delete

**Note:** see case 617044 JC has disclosed on all accounts in a defensive disclosure Oct 2001. Have ordered ledgers on sterling accounts and transactions are of the same vein so will not add value to disclosure to include them again. 4/7/02 - Disclosure confirmed. I can't see from the previous case what action, if any, we requested the RM to undertake. Given the background we should be seeking a detailed report from the RM on his knowledge of these customers. Place on spreadsheet and ensure we receive a response - I will need to comment on the High profile report. DH 5/8/02 - NCIS acknowledgement recd, ref 207993. passed to Special Branch 6.8.02 spoke to Terry they have received a six page document regarding the \$180K payt, it should be received at this office within next week. CLM10/9 - Paperwork received advising that the US dollar payment represented a donation from an aid agency in Yemen - they are a regular donor. Monies said to be for health, medical, and education projects. Looking at the US dollar account there are a number of subsequent payments to hospitals, for example, which would tend to substantiate the comments. Copies of the relevant paperwork have been scanned to the case. DH17/9/03 - When completing a further disclosure on this connection - see Goalkeeper Ref 710368 - a review of all linked disclosures was undertaken. The USD payment of 180,939 originated from the Islamic Charitable Society for the Support of Al-Aqsa. This organisation, albeit not at the time in June 2002, now appears on a list of named/suspected terrorists. GRM 29-05-03. I have spoken to Mark Ashtown (0207 230 3302) at NTFIU Special Branch and confirmed the above which he noted with interest. He did not support the need for a further disclosure at this point but advised that his investigations are ongoing and the bank may receive a further Production Order in due course. TOH

1. User: Migrated

On: 17 Sep 2003 00:00

Print

Copy

Home

**Note:** Further to our disclosure NI 142909, a large international payment has been received to the US\$ account on 6.6.02 for \$180,939 remitter details Hameed Thabit Sadoon, Saba Islamic Bank, Sana'a. A review of the sterling account has shown no significant change in turnover. We are reporting as the international payment is not in keeping with the size of payment seen previously.



1. **User:** Migrated

**On:** 17 Sep 2003 00:00

Print

Copy

Link

**Note:** On the basis of the information available to us at the present time, it is considered that the above incident / activity may constitute or involve money laundering and consequently a disclosure has been made to the National Criminal Intelligence Service or other appropriate authorities. Please see attached documents for further information concerning the financial disclosure. This information may be of relevance when considering any business approaches or dealings with the above named parties.

## Memorandum

To: Belinda Lane

Branch/ Unit: North East Thames CBC  
01-81-68

From: C McComas

Date: 09.07.02



Group Investigations & Fraud

Ground Floor  
Regents House  
PO Box 348  
42 Islington High Street  
London N1 8XL

Telephone: 020 7615 7246  
Switchboard: 020 7833 2121  
Facsimile: 020 7615 7287

**Re: Money Laundering Suspicion**

**Account: Palestinians Relief & Development Fund 60-08-22**

**Group Fraud Ref: 666814**

We refer to your/the attached report and advise the following:

- ☒ The decision has been taken to report the matter to the Authorities. The matter must be treated in the strictest confidence and under no circumstances should the account holder be advised of this action.
- ☐ Please update 'Know Your Customer' details and obtain an explanation for the transactions. Should you remain suspicious following your interview with the customer please revert to GI&F with a full explanation of your concerns.
- ☐ Please ensure you review the Bank's 'Know Your Customer' and Due Diligence in respect of this connection. You may wish to consider exiting the relationship unless you are entirely happy with your findings.
- ☐ We consider this connection presents a serious risk to the Group, accordingly it is our view that you should exit the relationship at the earliest opportunity. You may wish to use the attached wording.
- ☐ Please monitor the activity on this account and revert to Group Investigations & Fraud if the activity alters significantly giving further cause for concern.
- ☒ You may continue to operate the account within normal banking practice unless you hear from us to the contrary. Please forward a detailed report on your knowledge of this customer and the activities seen on the accounts.

Please note it is an offence to advise the customer or any other 3<sup>rd</sup> party of your report to us, that a report has been made to the authorities, or of any subsequent investigation.

Thank you for your assistance

Signed: .....

The Royal Bank of Scotland Group plc  
Registered in Scotland No 45581  
Registered Office: 36 St Andrew Square Edinburgh EH2 2YB

HIGHLY CONFIDENTIAL

NW 052080





Your ref:  
Our ref:

Ms C McComas  
Fraud Officer  
Group Investigations & Fraud  
Regents House  
42 Islington High Street  
London  
N1 8XL

9 August 2002

Commercial Banking  
Greater London East,  
Commercial Banking Centre  
PO Box 2401, 1<sup>st</sup> Floor  
10 South Street  
Romford  
Essex RM1 1BU  
E-mail: Belinda.Lane@nwb.co.uk

Telephone: 01708 774534  
Facsimile: 01708 733816

Dear Charlotte

Group Fraud Ref 666814 - Palestinian Relief & Development Fund

Further to your letter dated 1 August I have obtained the following information regarding the inland payment for US\$180k received on 6 June:-

1. The payment was a donation
2. The remitter was the Islamic Charitable Society for supporting Alqsa Al-Shareef (a holy shrine in Jerusalem)
3. The payment originated from Yemen
4. The party is a regular donor

I have enclosed further information from our customers in this respect.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Belinda'.

Belinda Lane  
Commercial Manager

NatWest Westminster Bank plc ("the Bank") is a member of the NatWest and Group's Marketing Group. The only packaged products (the package) will be those and other collective customer schemes and other services for those who are members of the Marketing Group. Those members are regulated by the Financial Services Authority. NatWest Westminster Bank plc is also a member of the London Stock Exchange.

NatWest Westminster Bank plc. Registered in England No 228227. Registered Office: 135 Bishopsgate, London EC2M 4UR.

Agency agreements with various members of the Royal Bank of Scotland Group.



**Group Investigations & Fraud**

Regent's House  
42 Islington High Street  
London N1 8XL

Telephone: 020 7615  
Switchboard: 020 7615 7267  
ITS 770  
Facsimile: 020 7615 7283

Your Ref:

Our Ref: 666814

Date: 01.08.02

Belinda Lane  
Greater London East Corporate Banking Centre  
PO BOX 2401  
1<sup>st</sup> Floor  
10 South Street  
ROMFORD

**RE PALESTINIAN RELIEF & DEVELOPMENT FUND**

**GROUP FRAUD REF 666814**

Belinda

Thank you for forwarding a copy of your findings regarding the above customer.

As you are aware City IBC instigated the suspicion report as a result of the large inland payment for US\$180K. As this is significantly in excess of other payments we will require further information regarding the transaction.

Please identify the following;

- 1 Was the payment a donation?
- 2 Who was the remitter?
- 3 Where did the payment originate?
- 4 Is this party a regular donator?

I understand you are on annual leave at this time, however would appreciate a reply in writing as a matter of urgency on your return. Thank you for your continued assistance in this matter.

Regards Charlotte McComas  
Fraud Officer

13:36

BT

0000

P. 1



**INTERPAL**  
الصندوق الفلسطيني للإغاثة والتنمية  
HELPING PALESTINIANS IN NEED

P.O. Box 3333  
LONDON  
NW6 1RW  
Tel: 020 8450 8802  
Fax: 020 8450 8304  
Email: info@interpal.org  
Website: www.interpal.org

BELEINDA LANT  
NATWEST PLC  
ROMFORD  
RM1 1HH  
FAX NO: 01708-733 816

Our Ref: (7805)  
Date: 6 August 2002

Dear Belinda,

Transfer from Abroad: Your Query

Further to your query and our telecon yesterday, please find attached correspondence relating to the transfer that is the subject of your query.

I confirm that the transfer of £180,939.03p is a donation from a aid agency in Yemen called the Islamic Charitable Society for the Support of Al-Aqsa Al-Sharief (the holy Aqsa Mosque) for charitable and humanitarian projects as detailed in the translation of the correspondence attached. In brief, the funds are for health and medical, and education projects.

Please find attached 6 pages of our letter of acknowledgement and receipt to them, and a copy of the transfer document that they forwarded to us. All the documents are accompanied by translations.

I trust this is what you require. Please do not hesitate to contact me should you need further information.

Yours sincerely,

Mr. E. Mustafa  
Vice-Chair of the Board of Trustees

Registered Charity No. 1040094

13:36

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p. 4

Brief Translation of document no 1  
Interpal's acknowledging letter to ...

The Islamic charitable society for the support of Al-Aqsa Al-Shareef (the holy Aqsa mosque).

The Republic of Yemen.

Subject: receiving the sum of (\$ 181,000.00)

We have received from you the sum of (\$181,000.00) one hundred and eighty one thousand dollar and that is for the following projects:

1. \$141,000.00 in supports for hospitals and medical centres and orphanage homes in the west bank and Gaza.
2. (\$10,000.00) in support of the family educational centre in the west bank and Gaza.
3. (\$20,000.00) support for the summer centres in the west bank and Gaza.
4. (\$10,000.00) support for the school kit project in the west bank and Gaza.

Please find enclosed a receipt no: (16-02)

Our brothers and sisters we do appreciate the effort you make in helping your brothers and sisters in Palestine. We would also like to assure you that each penny goes toward helping them. . . . .

13:36

AT

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P. 5

Brief Translation of document no 2  
Interpal's acknowledging letter to ...

Receipt no: 16-02

Dated : 05/06/02

We acknowledge the transfer made by The Islamic charitable society for  
the support of Al-Aqsa Al-Shareef (the holy Aqsa mosque). The  
Republic of Yemen.

The amount of : (\$181,000.00)

Method of payment: bank transfer

Projects implementations:

In supports for hospitals and medical centres and orphanage homes in the  
west bank and Gaza.

In support of the family educational centre in the west bank and Gaza.

In Support for the summer centres in the west bank and Gaza.

In Support for the school kit project in the west bank and Gaza.

Received by: the Palestinian Relief and Development Fund.

13:37

AT

0000

P. 8

Brief Translation of document no 3  
Interpal's acknowledging letter sent by The Islamic charitable society for  
the support of Al-Aqsa Al-Shareef (the holy Aqsa mosque). The  
Republic of Yemen

5. \$141,000.00 in supports for hospitals and medical centres and orphanage homes in the west bank and Gaza.
6. (\$10,000.00) in support of the family educational centre in the west bank and Gaza.
7. (\$20,000.00) support for the summer centres in the west bank and Gaza.
8. (\$10,000.00) support for the school kit project in the west bank and Gaza.

- a) Required one letter of acknowledgment for the whole amount and the exact amount of money as above and a receipt.
- b) Reports from all benefited documented with photographs project implementation and preferably accompanied with videos, letter of thanks from all of them.

Official  
stamp

Dated :02/06/02

The English writing is the bank payment copy showing all the details.



IBC 666814 HP  
617044

492

**The Royal Bank of Scotland**

**Corporate Banking Money Laundering Suspicion Report Form**

Surname/Business name <i>Palestinian Development Fund - Interhal</i>		Forename(s)									
Male/Female	Nationality (if known)	Date of Birth									
Address (include postcode) <i>P.O. Box 3333 London NW6 6-12W</i>		Additional/Alternate Address: <i>Flat 60 Black Knight Stilton Crescent London NW10 825</i>									
Telephone No:		Companies - Date of Country of Incorporation/registered No:									
No & Country of issue of Passport or other ID		document seen/source of introduction/reference taken:									
Account No(s)	Account Type	Date Opened									
1. 95142940 2. 95142975 3. 95142983 4. 95005247	<i>17/0/041 56438</i>	<i>550/0/08524862</i>									
Date when Relationship with Bank started: <i>4/10/1997</i>											
Stated Occupation: <i>as above</i>											
Name & Address of Employer:											
Additional/Associated Names:	Date of Birth:	In Account	Address, esp P/Codes/Passport No etc.								
<table border="1"> <thead> <tr> <th>Date</th> <th>Amount</th> <th>De/Cr</th> <th>Source/Destination e.g. Cash/Chq/UT/Sr/CHAPS to/from</th> </tr> </thead> <tbody> <tr> <td><i>4/6/12</i></td> <td><i>US\$ 180950.00</i></td> <td><i>CR</i></td> <td><i>IBAN 020606 02026 Hamed Thabit Saeed Sana Islamic Bank Sana'a</i></td> </tr> </tbody> </table>				Date	Amount	De/Cr	Source/Destination e.g. Cash/Chq/UT/Sr/CHAPS to/from	<i>4/6/12</i>	<i>US\$ 180950.00</i>	<i>CR</i>	<i>IBAN 020606 02026 Hamed Thabit Saeed Sana Islamic Bank Sana'a</i>
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<i>4/6/12</i>	<i>US\$ 180950.00</i>	<i>CR</i>	<i>IBAN 020606 02026 Hamed Thabit Saeed Sana Islamic Bank Sana'a</i>								
Reasons for Suspicion											
<p><i>Official Name - E. Mustafa, Ibrahim Brian Hewitt, &amp; Jundak, Mahfouz Safie</i></p> <p><i>Direct access customer to IBC S.E. a City</i></p> <p><i>When contacted to advise of receipt of money Mr Jundak (see above) commented the funds had been expected from Yemen</i></p> <p><i>Connection between Yemen, al Qaeda and present Middle East.</i></p>											



Corporate Banking Money Laundering Suspicion Report Form		
<p><i>Continued</i> 1/4 note of 27/02/2001 notes that a cheque was accepted with payee as <i>John</i> (= Holy Nat)</p>		
Security & safe Custody held (brief details only)		
Boxes & Parcels held		
Special Signing Instructions, e.g. Third party mandates		
<p>If a company/partnership etc attach a copy of mandate</p> <p>Other accounts known to be held (including Building Societies)</p>		
Status Enquiries Received		
<p>Nature of Suspected Offence</p> <p><i>Possible umbrella - for funding terrorism in Middle East</i></p>		<p>Drug Trafficking</p> <p>Terrorism <input checked="" type="checkbox"/></p> <p>Other crime</p>
Branch / Depart Ref:	Name of Contact	Tel/ITS Ext.
<i>IBC CITY</i>	<i>N. MORRISON</i>	<i>7-8067-6849</i>
Signed:	Senior Officer/Manager	Date
<i>N. Morrison</i>	<i>[Signature]</i>	<i>7/6/2002</i>

**NCIS Disclosure for Case 666814 ( Received )**

Close Print

**Core NCIS details created on 17 Jun 2002 by RBS\Mcomel [ Submitted by RBS\Hartida on 04-JUL-02 ]**

Disclosure Type	Terrorism	Submitting Branch Address	Natwest
Disclosure Date	17 Jun 2002		City IBC
Branch / Outlet	Finsbury Park		
Branch Code	60-08-22		
Trust Indicator	N		
Further Information	Y	Postcode	

Text

Further to our disclosure NI 142909, a large international payment has been received to the US\$ account on 6.6.02 for \$180,939 remitter details Hameed Thabit Sadoon, Saba Islamic Bank, Sana'a. A review of the sterling account has shown no significant change in turnover. We are reporting as the international payment is not in keeping with the size of payment seen previously.

**Associated Subject: HEWITT, IBRAHIM (Person)**

Surname	HEWITT	Date of Birth	
Forename 1	IBRAHIM	Occupation	
Forename 2	BRIAN	Employer	
Gender	Male	Association chairman	
Information			

**Associated Subject: MUSTAFA, E (Person)**

Surname	MUSTAFA	Date of Birth	17 Nov 1955
Forename 1	E	Occupation	
Forename 2		Employer	
Gender	Male	Association official	
Information			

**Address for E MUSTAFA**

Address Line	60 CLARK CRT	Address Type Home
	STILTON CRES	Current Yes
	LONDON	
	UNITED KINGDOM	
Postcode	NW10 8DJ	

**Associated Subject: QUNDIL, J (Person)**

Surname	QUNDIL	Date of Birth	
Forename 1	J	Occupation	
Forename 2		Employer	
Gender	Male	Association secretary	
Information			

**Associated Subject: SADOON , HAMEED (Person)**

Surname	SADOON	Date of Birth
Forename 1	HAMEED	Occupation
Forename 2	THABIT	Employer
Gender	Male	Association remitter of funds
Information		

**Associated Subject: SAFIEE , Mahfouz (Person)**

Surname	SAFIEE	Date of Birth
Forename 1	Mahfouz	Occupation
Forename 2		Employer
Gender	Male	Association trustee
Information		

**(Main Subject) PALESTINIANS RELIEF & DEVELOPMENT FUND (Company)**

Company Name	PALESTINIANS RELIEF & DEVELOPMENT FUND	Company Number
VAT Number		Country UK
Business Type		Association
Information		

**Address for PALESTINIANS RELIEF & DEVELOPMENT FUND**

Address Line	PO BOX 3333 LONDON  UNITED KINGDOM	Address Type Other Current Yes
Postcode	NW6 1RW	

**Address for PALESTINIANS RELIEF & DEVELOPMENT FUND**

Address Line	60 CLARK CRT STILTON CRES LONDON  UNITED KINGDOM	Address Type Registered Current Yes
Postcode	NW10 8DJ	

**Transaction for PALESTINIANS RELIEF & DEVELOPMENT FUND**

FI Number		Account Opened
Sort Code	60-08-22	Account Closed
Acc. Number	140-00-04156838	Balance
Acc. Name	PALESTINIANS RELIEF & DEVELOPMENT FUND	Balance On
Credit/Debit	Credit	Acc. Currency GBP
Pre 1992	N	

Turnover Credits  
Turnover Debits  
Turnover Period

Transaction Type Wire Trsfr  
Transaction Date 06 Jun 2002  
Amount 180939.00  
Currency USD  
Amount (Sterling)